

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS
LICENSING & DEVELOPMENT,

Plaintiff,

V.

GOOGLE, LLC,

Defendant

Case No. 6:20-cv-00580-ADA

Case No. 6:20-cv-00585-ADA

JURY TRIAL DEMANDED

**DECLARATION OF JOSEPH M. ABRAHAM ON BEHALF OF PLAINTIFF BRAZOS
LICENSING & DEVELOPMENT IN SUPPORT OF PLAINTIFF’S
MOTION FOR SUMMARY JUDGMENT
CONCERNING GOOGLE’S AFFIRMATIVE DEFENSES**

I, Joseph M. Abraham, declare as follows:

1. I am an attorney duly admitted to practice before this Court.
2. I am a principal of Folio Law Group PLLC, counsel of record for Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing & Development (“Brazos”).
3. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.
4. I make this declaration in support of Plaintiff Brazos Licensing & Development’s Motion for Summary Judgment Concerning Google’s Affirmative Defenses.
5. Attached, as Exhibit A, is a true and correct copy of Brazos Licensing and Development’s Third Set of Interrogatories to Defendant Google, dated September 15, 2021.
6. Attached, as Exhibit B, is a true and correct copy of excerpts of Defendant Google LLC’s Objections and Responses to WSOU’s Third Set of Interrogatories (Nos. 10-15) (580 Case), dated October 15, 2021.
7. Attached, as Exhibit C, is a true and correct copy of excerpts of Defendant Google LLC’s Objections and Responses to WSOU’s Third Set of Interrogatories (Nos. 10-15) (585 Case), dated October 15, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Austin, Texas, on June 28, 2023.

By: /s/ Joseph M. Abraham
Joseph M. Abraham